

EISBROUCH & MARSH, LLC

David L. Eisbrouch, Esq. - NJ ID 012361989

90 Main Street, Suite 204

Hackensack, NJ 07601

Attorneys for Plaintiff

Plaintiff(s)

Maria Piedrahita and Rosanna
Lantigua

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

vs.

DOCKET NO.:

Defendant(s)

Classic Bus Lines Inc., Ezequiel A.
Fuentes Guedes and Juana Rosario

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiffs, Maria Piedrahita and Rosanna Lantigua, residing in Elmhurst, New York, through their attorneys, Eisbrouch & Marsh, LLC, by way of Complaint against the Defendants, say:

FIRST COUNT

1. On or about July 14, 2019, plaintiff, Maria Piedrahita, was the front seat passenger in a motor vehicle owned and operated by defendant, Juana Rosario, on the New Jersey Turnpike SN95X roadway in the Borough of Teaneck, County of Bergen and State of New Jersey.

2. At the same time, defendant, Ezequiel A. Fuentes Guedes, was the operator of a bus owned by defendant, Classic Bus Lines, Inc., on the New Jersey Turnpike SN95X in the Borough of Teaneck, County of Bergen and State of New Jersey.

3. Defendant, Ezequiel A. Fuentes Guedes, was negligent in the operation of the

bus owned by defendant, Classic Bus Lines, Inc., in that he was inattentive and failed to observe the traffic in front of and around him, made an improper lane change, which carelessness, recklessness and inattentiveness caused his vehicle to collide with the vehicle being operated by defendant, Juana Rosario, in which the plaintiff, Maria Piedrahita, was a passenger.

4. Defendant, Juana Rosario, was negligent in the operation of her motor vehicle, in that she was inattentive and failed to observe the traffic in front of and around her, which carelessness, recklessness and inattentiveness caused a collision with the bus being operated by defendant, Ezequiel A. Fuentes Guedes, and owned by defendant, Classic Bus Lines, Inc.

5. That as a direct and proximate result of the aforesaid carelessness, recklessness and negligence of the defendants, the plaintiff, Maria Piedrahita, has sustained personal injuries resulting in a fracture and/or a permanent consequential limitation of use of a body organ or member; and/or a significant limitation of use of a body functional system, pursuant to N.J.S.A. 39:6A-8(a) and has incurred and in the future will incur expenses for the treatment of said injuries, has been disabled and in the future will be disabled and unable to perform her usual functions, has been caused and in the future will be caused great pain and suffering, to her great loss and damage, and upon information belief, certain of plaintiff's injuries, together with the pain, suffering and inconvenience accompanying same, are permanent in nature and will continue in the future.

WHEREFORE, plaintiff, Maria Piedrahita, demands judgment against the defendants, Ezequiel A. Fuentes Guedes, Classic Bus Lines, Inc. and Juana Rosario, individually, jointly or severally, for damages, interest and costs of suit.

SECOND COUNT

1. Plaintiffs repeat, reiterate and reallege each and every allegation contained in the First Count as though fully set forth at length herein.

2. On or about July 14, 2019, plaintiff, Rosanna Lantigua, was a rear seat passenger in a motor vehicle owned and operated by defendant, Juana Rosario, on the New Jersey Turnpike SN95X roadway in the Borough of Teaneck, County of Bergen and State of New Jersey.

3. At the same time, defendant, Ezequiel A. Fuentes Guedes, was the operator of a bus owned by defendant, Classic Bus Lines, Inc., on the New Jersey Turnpike SN95X in the Borough of Teaneck, County of Bergen and State of New Jersey.

4. Defendant, Ezequiel A. Fuentes Guedes, was negligent in the operation of the bus owned by defendant, Classic Bus Lines, Inc., in that he was inattentive and failed to observe the traffic in front of and around him, made an improper lane change, which carelessness, recklessness and inattentiveness caused his vehicle to collide with the vehicle being operated by defendant, Juana Rosario, in which the plaintiff, Rosanna Lantigua, was a passenger.

5. Defendant, Juana Rosario, was negligent in the operation of her motor vehicle, in that she was inattentive and failed to observe the traffic in front of and around her, which carelessness, recklessness and inattentiveness caused a collision with the bus being operated by defendant, Ezequiel A. Fuentes Guedes, and owned by defendant, Classic Bus Lines, Inc.

6. That as a direct and proximate result of the aforesaid carelessness, recklessness and negligence of the defendants, the plaintiff, Rosanna Lantigua, has sustained personal injuries resulting in a fracture and/or a permanent consequential limitation of use of a body

organ or member; and/or a significant limitation of use of a body functional system, pursuant to N.J.S.A. 39:6A-8(a) and has incurred and in the future will incur expenses for the treatment of said injuries, has been disabled and in the future will be disabled and unable to perform her usual functions, has been caused and in the future will be caused great pain and suffering, to her great loss and damage, and upon information belief, certain of plaintiff's injuries, together with the pain, suffering and inconvenience accompanying same, are permanent in nature and will continue in the future.

WHEREFORE, plaintiff, Rosanna Lantigua, demands judgment against the defendants, Ezequiel A. Fuentes Guedes, Classic Bus Lines, Inc. and Juana Rosario, individually, jointly or severally for damages, interest and costs of suit.

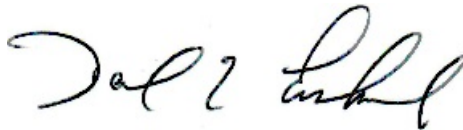
JURY DEMAND

Plaintiffs hereby demand trial by jury on all issues so triable.

DESIGNATION OF TRIAL COUNSEL

Plaintiffs hereby designate David L. Eisbrouch, Esq. as trial counsel in this matter.

EISBROUCH & MARSH, LLC
Attorneys for Plaintiff



By: _____
DAVID L. EISBROUCH, ESQ.

Dated: 3/10/20